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5 ATTORNEY FOR PLAINTIFF  
Travis Buntin

6  
7 **IN THE SUPERIOR COURT FOR THE STATE OF ALASKA**  
8 **THIRD JUDICIAL DISTRICT AT ANCHORAGE**

9 TRAVIS BUNTIN,

10 Plaintiff,

11 -vs-

12 SCHLUMBERGER TECHNOLOGY  
CORPORATION, and  
13 AARON BOOGAERTS

14 Defendants.

Case No. 3AN-16- 5240 CI

15  
16 **COMPLAINT**

17 COMES NOW the Plaintiff Travis Buntin through his attorney, Daniel Pace of the  
18 Pace Law Offices, and alleges the following as his complaint:

19 **JURISDICTIONAL ALLEGATIONS**

20 1. This is an action to recover overtime compensation under the Alaska Wage  
21 and Hour Act pursuant to AS 23.10.110(a), (b), and (c) and AS 23.10.060.

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Complaint

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2. At all times relevant herein, plaintiff was an employee of defendants and a resident of the Third Judicial District, State of Alaska.

3. At all times relevant herein, defendant Schlumberger Technology Corporation was a Texas corporation with an office located in Anchorage, AK and an employer of plaintiff.

4. At all times relevant herein, defendant Aaron Boogaerts was a resident of the Third Judicial District, State of Alaska and was an employer of plaintiff.

5. The Superior Court has jurisdiction over this action pursuant to AS 22.10.020 as plaintiff is seeking a recovery of money damages in excess of \$100,000.00, exclusive of costs, interest, and attorney fees.

6. Venue is proper in the third judicial district pursuant to AS 22.10.030 and Alaska Rule of Civil Procedure 3(c) as the arose and in Anchorage, Alaska.

## GENERAL ALLEGATIONS

7. Defendants are in the business of supplying technology for oil and gas development here in the State of Alaska.

8. Plaintiff and defendants entered into an employment contract at or around June 6, 2009 where defendants hired plaintiff as an Operator and eventually promoted him to Specialist in October 2013.

9. A term of the employment contract required defendants to pay plaintiff severance pay in the event plaintiff's employment was terminated.

10. Plaintiff worked in excess of 40 hours per week and 8 hours per day.

**PAGE  
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### Complaint

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1 11. Defendants did not pay plaintiff overtime wages for any time worked in  
2 excess of 40 hours per week or 8 hours per day.

3 12. On February 15, 2016, defendants terminated plaintiff's employment.

4 13. Defendants breached the employment contract by failing to pay plaintiff  
5 severance wages within three working days of termination.

6 **COUNT I**

7 **Breach of Contract**

8 14. The previous paragraphs are incorporated herein.

9 15. Plaintiff and defendants entered into a contract where defendants were to pay  
10 plaintiff severance pay upon termination of the employment contract.

11 16. Defendants breached the contract when they terminated plaintiff and failed  
12 to pay plaintiff severance pay.

13 17. Plaintiff has been harmed by defendants' breach.

14 **COUNT II**

15 **Failure to Pay Overtime, AS 23.10.060**

16 18. The previous paragraphs are incorporated herein.

17 19. Plaintiff was an employee of defendants.

18 20. Plaintiff worked over 8 hours in a day or 40 hours in a week.

19 21. Defendant failed to pay plaintiff overtime when it was due.

20 22. Plaintiff has been harmed by defendant's conduct.

21

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**Complaint**

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, the plaintiff requests that he be awarded the following relief:

- 3 1. An award of damages for past overtime wages.
- 4 2. An award of damages for defendants' failure to pay plaintiff severance wages
- 5 within three working days of termination.
- 6 3. An award of liquidated damages in an amount to be proven at trial.
- 7 4. An award of prejudgment interest, post judgment interest, costs and
- 8 attorney's fees incurred in bringing this action.
- 9 5. Any additional relief, including equitable relief, the Court deems appropriate
- 10 under the circumstances.

11

12 DATED this 7th day of March, 2016, at Anchorage, Alaska.

13 **PACE LAW OFFICES**

14 Attorney for Plaintiff

15 Travis Buntin

16   
Daniel I. Pace

17 Alaska Bar No. 1305008

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